

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JAYLEN BRANTLEY
7 Westwood Drive
Springfield, MA 01129

and

JARED NICKENS
3206 Wildwood Court
Monmouth Junction, NJ 08852

Plaintiffs

v.

EPIC GAMES, Inc., a North Carolina
Corporation;
Serve Resident Agent: Canon Pence
620 Crossroads Boulevard
Cary, NC 27518-6965

and

JOHN AND JANE DOES 1 THROUGH 50
JOHN DOE CORPORATIONS 1 THROUGH 10

Defendants

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Case No.:

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**Complaint and Demand
for Jury Trial**

COMPLAINT

Plaintiffs Jared Nickens and Jaylen Brantley ("Plaintiffs"), by
and through their undersigned counsel, assert the following claims
against Defendants, Epic Games, Inc. ("Epic"), John and Jane Does 1
through 50 and John Doe Corporations 1 through 10, (collectively referred
to as "Defendants"), and allege as follows:

I. NATURE OF ACTION

1. Through its unauthorized misappropriation of Plaintiffs' highly popular dance craze, the "Running Man," in its video game Fortnite Battle Royale ("Fortnite"), the Defendants have unfairly profited from exploiting Plaintiffs' protected creative expression and likeness.

2. Plaintiffs created, named and/or popularized the Running Man dance which exploded in popularity following its creation in early 2016, after it went "viral" once its accompanying video was posted on the internet in April of 2016, and after Plaintiffs' appearance on "The Ellen DeGeneres Show," that demonstrated the dance. Plaintiffs' video has over 2 million views to date on Instagram alone, as well as additional millions of views on YouTube and Facebook. Plaintiffs' video was among the very top searched finds on Google for 2016.

3. Defendant capitalized on the Running Man's dance popularity, particularly with its younger fans, by selling the dance as an in-game purchase in Fortnite, under the name "Running Man," which players can buy to customize their avatars for use in the game. This dance was immediately recognized by players and media worldwide as the Running Man dance. Although identical to the dance named, created, popularized, and demonstrated by Plaintiffs, Epic did not credit Plaintiffs nor seek their consent to use, display, reproduce, sell, or create a derivative work based upon Plaintiffs' Running Man dance or likeness.

4. Since being released in or around September 2017, Fortnite has become among the most popular video games ever. Indeed, Fortnite *made* approximately \$126 million *in profits* in February 2018, \$223 million in March, \$296 million in April, and \$318 million in May 2018 alone (the "biggest month ever for a video game."). *Profits alone* in 2018 exceeded \$3 billion, according to widely published reports. As a free-to-play game, Fortnite derives its sales exclusively through these types of in-game purchases. Epic should not be able to profit from Plaintiffs' fame, creativity and hard work by its intentional misappropriation of Plaintiffs' original content or likeness. Plaintiffs seek injunctive relief and damages, including, but not limited to, Epic's profits attributed to its improper sale and/or use of the Running Man dance and Plaintiffs' likeness.

II. THE PARTIES

5. Plaintiff Nickens now resides in Monmouth Junction, New Jersey and Plaintiff Brantley resides in Springfield, Massachusetts. At the time of the creation of Plaintiffs' video, both lived in the State of Maryland and attended the University of Maryland.

6. Epic is a North Carolina business corporation with its principal place of business at 620 Crossroads Boulevard, Cary, North Carolina, 27518. Epic and John and Jane Does 1 through 50 and John Does Corporations 1 through 10 are the creators and developers of the Fortnite video game franchise, which was first

released in July 2017.

III. SUBJECT MATTER JURISDICTION AND VENUE

7. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1331 (federal question), diversity jurisdiction pursuant to 28 U.S.C. §1332, and supplemental jurisdiction pursuant to 28 U.S.C. § 1367.

8. Venue is proper in this District under 28 U.S.C. § 1391(b)(1), (2) and (c) because Defendants transact substantial business in this District and because a substantial part of the events or omissions giving rise to this claim occurred in this District, including the creation and publication of the Running Man dance while Plaintiffs were living at The University of Maryland.

IV. FACTUAL BACKGROUND

A. Plaintiffs and the Creation of the Running Man

9. In 2016, Plaintiffs created a dance, which they named the “Running Man” while listening and dancing to music with their friends and teammates. The dance is distinctive and immediately recognizable.

10. Since creating the dance, Plaintiffs incorporated it into routines in and around the State of Maryland, including during pre and half time breaks with members of The University of Maryland basketball team. Plaintiffs also posted videos of themselves and their friends, who later imitated the dance and posted it on social media

sites, including performing the dance on *YouTube* and other social media platforms, such as *Instagram* and *Facebook*.

11. By the end of 2016, the Running Man dance video(s) had over one million views on *YouTube* and thousands of people began posting their own videos showing themselves performing the Running Man, partly as a result of a “challenge” from Plaintiffs to other college basketball players posted on social media. The video now has over 100 million views on *YouTube*, and was a *Google* top search in 2016.

12. Since its release in 2016, and its rise to fame later that year, the Running Man dance maintained its popularity.

13. The Running Man has become synonymous with Plaintiffs, who are credited with creating the dance and video that became “viral.”

B. Fortnite: The Most Popular Game Ever

14. Even prior to releasing Fortnite, which would become among the most popular and successful video games ever, Epic had already developed two popular video game franchises: Unreal and Gears of War. Since releasing the first Gears of War game in 2005, Epic released several subsequent Gears of War video games, and the franchise has made over \$1 billion in total sales.

15. At or around 2011, following the release of the third Gears of War installment, Fortnite began from an Epic internal video game

hackathon, or a gathering of Epic developers to brainstorm ideas and create games in a short period. Although the Fortnite game was not developed during the hackathon, the idea to merge building games (i.e., Minecraft) and shooter games (i.e. Gears of War or Call of Duty) emerged during the Hackathon.

16. On or around July 2017, Epic released the initial version of Fortnite as a paid early-access video game. However, by September 2017, after PlayerUnknown's Battlegrounds - a game which occupied the same "battle royale" genre as Fortnite-became a worldwide success, Epic released Fortnite Battle Royale, a free-to-play battle royale third person shooting game on the Windows, macOS, PlayStation 4 and Xbox One platforms. Epic subsequently released Fortnite on the iOS, Nintendo and Android platforms on April 2, 2018, June 12, 2018, and August 9, 2018, respectively.

17. Similar to PlayerUnknown's Battlegrounds, Fortnite 15 utilizes the battle royale format where up to 100 players, alone, in pairs, or groups, compete to be the last player or group alive.

18. As a free-to-play video game, Epic allows players to download and play Fortnite for free. Fortnite is supported by in-game transactions where players can purchase virtual currency, called "Vinderbucks" or "V-Bucks." The players in turn use V-Bucks to purchase customizations for their in-game avatars, including new characters, pickaxe modifications, glider skins, clothes and "emotes"

(dances or movements). Fortnite also sells "Battle Passes" or additional levels that allow you to unlock skins, gliders and emotes unique to that Pass. Fortnite offers four pricing levels for purchasing V-Bucks:

- 1) 1,000 V-Bucks for \$9.99 ;
- 2) 2,5000 (+300 Bonus) V-Bucks for \$24.99;
- 3) 6,000 (+1,500 Bonus) V-Bucks for \$59.99; or
- 4) 10,000 (+3,500 Bonus) V-Bucks for \$99.99.

19. There are four types of emotes: common emotes, uncommon emotes, rare emotes, and epic emotes. The rarer the emote, the more expensive or harder it is to obtain. Uncommon emotes cost 200 V-Bucks. Rare emotes cost 500 V-Bucks. And Epic emotes cost 800 V-Bucks.

20. To start, Fortnite provides each player with the *Dance Moves emote*, a common emote, for no compensation. Players can then obtain other emotes by purchasing and playing additional levels in Battle Passes (950 V-Bucks each) that come with emotes unique to that Pass, or by purchasing certain emotes directly with V-Bucks. On some 12 occasions, Fortnite sells Battle Pass emotes directly, without requiring the player to purchase the Battle Pass.

21. Emotes are incredibly popular and are fundamental to Fortnite's success. Players purchase emotes, alongside clothing and skins, to personalize their Fortnite experience. Emotes have also

become popular outside Fortnite. Professional athletes in soccer and other sports have based their celebrations on Fortnite emotes. Young adults, teenagers, and kids also post videos of themselves on YouTube and social media performing emotes under various hashtags, including #fortnitedance or #fortnitevideos.

22. Upon information and belief, Epic creates emotes by copying and coding dances and movements directly from popular videos, movies, and television shows without consent. Epic does so by coding still frames of the source material. For example, upon information and belief, Epic coded the "Ride the Pony" emote, frame-by-frame, from the "Gangnam Style" dance made famous by the Korean entertainer, Psy. The Ride the Pony emote and Psy's dance are identical in every respect. On information and belief, Epic did not obtain Psy's authorization for copying the dance and including it in Fortnite.

23. Upon information and belief, Epic has also consistently sought to exploit African American talent, in particular in Fortnite, by copying their dances and movements. Epic has copied the dances and movements of numerous African-American performers, including, for example, the dance from the 2004 Snoop Dogg music video, "Drop It Like It's Hot" (named the "Tidy" emote), Alfonso Ribeiro's performance of his famous "Carlton" dance on The Fresh Prince of Bel-Air television show (named the "Fresh" emote), the dance performed by Will Smith

on the same television show (named the “Rambunctious” emote), the dance in Marlon Webb’s popular “Band of the Bold” video (named the Best Mates” emote), Donald Faison’s signature dance seen on the NBC television show Scrubs (named the “Dance Moves” emote), and the most pertinent here, Plaintiffs’ Running Man dance. Upon information and belief, Epic did not seek consent or authorization to use any of these movements or dances.

24. Soon after its release, Fortnite became an international phenomenon. The game eclipsed 10 million players merely two weeks after its release; 125 million players by July 2018. In November 2018, Bloomberg announced that Fortnite had 200 million player accounts across all platforms.

25. Fortnite’s popularity has translated into record sales for Epic. Analysts have estimated that since its release, Fortnite has generated between \$1 billion to \$2 billion in revenue through in-game purchases, such as emotes. In May 2018, Fortnite broke its own record by generating approximately \$318 million in revenue, the biggest month ever for a video game. In fact, nearly 80 million people played Fortnite in August 2018. Because of Fortnite’s success, Epic’s estimated valuation rose from about \$825 million to about \$5 billion. Bloomberg estimates that Epic’s valuation could grow to \$8.5 billion by 2018’s end.

C. Fortnite’s Unauthorized Use of the Running Man

26. On July 12, 2018, Fortnite released its Season 5 Battle Pass. Players could purchase the Battle Pass, alongside its accompanying emotes and other customizations, for the regular price of 950 V-Bucks. As part of the Season 5 Pass, Fortnite offered a new rare emote that it called "The Running Man Emote." According to Fortnite, players can obtain the Running Man emote as a reward from Tier 63 of the Season 5 Battle Pass. Also, on certain occasions, Fortnite sold the Running Man emote separately for 500 V-Bucks.

27. The Running Man emote is *identical* to the Running Man dance, and identical to the dance performed on the video of Plaintiffs' posted to YouTube. If obtained or purchased, the Fortnite player's avatar can perform the dance during Fortnite gameplay. The reaction from many players worldwide was immediate recognition of the emote as embodying the "Running Man" while others likely believed it was Epic's original creation.

28. Upon information and belief, Epic intentionally developed that emote by copying the original video of the Running Man dance and/or copying an identical version of said video, to intentionally mimic Plaintiffs performing the Running Man. In fact, players have asked for it by name in various online forums relating to Fortnite.

29. Epic did not seek to obtain Plaintiffs' authorization or consent for its use of their likeness and the Running Man dance for the emote.

30. Moreover, Plaintiffs did not give Epic express or implied consent for its use of their likeness and the Running Man dance for the emote. Epic also did not compensate Plaintiffs' for its use of their likeness and the Running Man dance for its emote.

31. Upon information and belief, Epic added the emote to intentionally exploit for its own benefit the popularity of Plaintiffs and the Running Man dance without providing Plaintiffs any form of compensation.

32. Epic profited from its improper misappropriation of the Running Man dance by, *inter alia*: 1) selling the infringing Running Man emote directly to players; 2) selling the Season 5 Battle Pass that contains the emote; 3) advertising the emote to attract additional players, including those persons familiar with the Running Man dance to play Fortnite and make in-game purchases; 4) retaining and attracting players by incentivizing those players to continue playing Fortnite; 5) impliedly representing that Plaintiffs endorsed Epic's use of their likeness; 6) creating an erroneous conclusion that its emote was in fact associated with Running Man; 7) creating the false impression that Plaintiffs endorsed Fortnite; and 8) inducing and/or contributing to Fortnite players' avatars performing the Running Man dance.

33. Upon information and belief, Epic uses the Running Man, and other dances, to create the false impression that Epic started these dances and crazes or that the artist who created them is

endorsing the game. Indeed, players have posted thousands of videos themselves performing the Running Man Emote with the hashtag #fortnitedance, without referencing the Running Man or crediting Plaintiffs as the dance's creators, authors and owners. Accordingly, upon information and belief, Epic actively and knowingly directs, causes, induces, and encourages others, including, but not limited to, its players, designers, suppliers, distributors, resellers, software developers, and repair providers, to copy, distribute and sell the Running Man dance and to misappropriate Plaintiffs' names and likenesses.

34. Plaintiffs have stated in interviews that they do not consent or approve Epic's use of the Running Man for the emote. Other prominent artists, including Chancelor Bennett, known as Chance the Rapper, have also publicly disapproved of Epic's practices, and advocated for Epic sharing profits with the artists that created these dances.

35. Accordingly, Epic made a financial fortune from unlawfully and unfairly stealing Plaintiffs' and other artists' creative expression and likeness without crediting or compensating these artists. Plaintiffs thus bring this suit to prevent Fortnite from further using the Running Man and to recover the profits rightfully owed to them.

COUNT ONE

(Infringement of Copyright)

36. Plaintiffs hereby repeat and re-allege the allegations set forth in paragraphs 1 through 35, above, as though fully set forth herein.

37. On or around April of 2016 Plaintiffs' Running Man video was published to *YouTube* where it can be accessed by millions of people. The Running Man music video shows Plaintiffs performing the Running Man dance with their friends and teammates.

38. Plaintiffs are the undisputed authors and creators of the wildly popular and immediately recognizable Running Man dance. Plaintiffs' videos are the original depictions of the Running Man dance.

39. Plaintiffs are in the process of registering the Running Man dance with the United States Copyright Office. On January 4, 2019, Plaintiffs submitted an application for copyright registration of the Running Man dance.

40. Defendants have infringed and continue to infringe Plaintiffs' copyrights in the Running Man by selling the Running Man dance emote as an in-game purchase, under the name Running Man, that, if purchased, a player can use to make his or her avatar perform during Fortnite gameplay; substantially copying the Running Man and the likeness of Plaintiffs in digital form to the Fortnite game; advertising the Running Man in its promotional materials; and creating the

Running Man emote as a derivative work of the Running Man dance.

41. Defendants did not seek to obtain Plaintiffs' permission for its use of the Running Man for the Running Man emote. Nor have Defendants compensated or credited Plaintiffs for their use of the Running Man.

42. Moreover, Defendants actively and knowingly directed, caused, induced and encouraged others, including, but not limited to, its players, designers, suppliers, distributors, resellers, software developers, and repair providers, to misappropriate Plaintiffs' likeness and to copy, distribute and profit from the Running Man dance.

43. Defendants' acts of infringement have been willful, intention, and purposeful, in disregard of and with indifference to Plaintiffs' rights.

44. As a result of Defendants' conduct, Plaintiffs have been damaged by being precluded from receiving their rightful share of the profits earned by Epic for its improper and unlicensed use of Plaintiffs' exclusive copyrights in the Running Man dance in Fortnite, and for Epic's improper and unlicensed use of Plaintiffs' image and Plaintiffs' video where the Running Man dance was first demonstrated and then misappropriated by Defendants.

45. Plaintiffs are entitled to permanent injunctive relief preventing Defendants, and their officers, agents, and employees, and

all related persons from further using the Running Man and engaging in other acts in violation of the Copyright Act, 17 U.S.C. Section 101 *et. seq.*.

46. As a direct and proximate result of Defendants' infringement of Plaintiffs' copyrights and exclusive rights of a copyright owner as enumerated above, Plaintiffs are also entitled to recover damages, including statutory damages and attorneys' fees, and any profits obtained by Defendants as a result of the infringements alleged above in an amount according to proof to be determined at the time of trial.

47. In doing the acts herein alleged, Defendants acted fraudulently, willfully, and with malice, and Plaintiffs are therefore entitled to punitive damages.

COUNT TWO

(Contributory Infringement of Copyright)

48. Plaintiffs hereby repeat and re-allege the allegations set forth in paragraphs 1 through 47, above, as though fully set forth herein.

49. Plaintiffs are in the process of registering the Running Man dance with the United States Copyright Office. On or about January 7, 2019 Plaintiffs submitted an application for copyright registration of the Running Man dance.

50. Defendants have infringed and continue to infringe Plaintiffs' copyrights in the Running Man by selling the Running Man dance emote as an in-game purchase, under the name Running Man, that, if purchased, a player can use to make his or her avatar perform during Fortnite gameplay; substantially copying the Running Man and Plaintiffs' likeness in digital form to the Fortnite game; advertising the Running Man in its promotional materials; and creating the Running Man emote as a derivative work of the Running Man dance.

51. By providing the Running Man emote necessary for its players to commit direct copyright infringement, Defendants have and continue to materially contribute to the unauthorized reproductions and distributions by its players of the Running Man and of the likeness of Plaintiffs.

52. Defendants did not seek to obtain Plaintiffs' permission for its use of the Running Man for the Running Man emote. Nor have Defendants compensated or credited Plaintiffs for their use of the Running Man.

53. Moreover, Defendants actively and knowingly directed, caused, induced, and encouraged others, including but not limited to players, designers, suppliers, distributors, resellers, software developers, and repair providers, to misappropriate Plaintiffs likeness and the Running Man dance.

54. Defendants' acts of infringement have been willful, intention, and purposeful, in disregard of and with indifference to Plaintiffs' rights.

55. Defendants' willful and continued unauthorized use of the Running Man for commercial gain has caused and will continue to cause confusion and mistake by leading the public to erroneously associate the Running Man emote offered by Epic with the Running Man dance in violation of 15 U.S.C. §§1051 *et. seq.*

56. As a result of Defendants' conduct, Plaintiffs have been damaged by being precluded from receiving their rightful share of the profits earned by Epic for its improper and unlicensed use of Plaintiffs' exclusive copyrights and the improper use of Plaintiffs' likeness in the Running Man dance in Fortnite.

57. Defendants' conduct is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiffs great and irreparable injury that cannot be compensated or measured in money. Plaintiffs have no adequate remedy at law. Pursuant to 17 U.S.C. §502, Plaintiffs are entitled to injunctive relief, prohibiting further contributory infringements of Plaintiffs' copyrights.

58. As a direct and proximate result of Defendants' infringement of Plaintiffs' copyrights and exclusive rights under copyright, Plaintiffs are also entitled to recover damages, including

attorneys' fees, and any profits obtained by Defendants and as a result of the infringements alleged above in an amount according to proof to be determined at the time of trial. 15 U.S.C Section 1051 *et. seq.*

59. In doing the acts herein alleged, Defendants acted fraudulently, willfully, and with malice, and Plaintiffs are therefore entitled to punitive damages according to proof at the time of trial.

COUNT THREE

(Violation of Publicity Rights)

60. Plaintiffs hereby repeat and re-allege the allegations set forth in paragraphs 1 through 59, above, as though fully set forth herein.

61. Through the use of Running Man dance as an in-game dance emote that can be purchased, Defendants misappropriated Plaintiffs' identities. The Running Man emote depicts Plaintiffs performing the Running Man dance. Upon information and belief, Defendants created the Running Man emote by capturing and digitally copying Plaintiffs performing the Running Man dance. Defendants then utilized the digital copy to create code that, if purchased, allows the player's avatars to perform the Running Man dance identical to Plaintiffs' version.

62. Defendants did not seek or obtain Plaintiffs' authorization or consent for its use of their likeness for the Running Man emote, and otherwise have willfully and intentionally used Plaintiff's rights of

publicity. Nor have Defendants compensated or credited Plaintiffs for their use of the Running Man.

63. Defendants used Plaintiffs' likeness to generate significant wealth by: 1) selling the infringing Running Man emote directly to players; 2) selling the Season 5 Battle Pass that contains the emote; 3) advertising the emote to attract additional players, including those persons familiar with the Running Man to play Fortnite and make in-game purchases; 4) staying relevant to its current players to incentivize those players to continue playing Fortnite; 5) impliedly representing that Plaintiffs consented to Epic's use of their likeness; 6) erroneously causing an association of its emote with Running Man; 7) creating the false impression that Plaintiffs endorsed Fortnite; and 8) inducing and/or contributing to Fortnite players' avatars performing the Running Man dance.

64. Plaintiffs were damaged by Defendant's conduct as they were prevented from realizing the profits of licensing their likeness to Defendant for commercial gain.

65. Defendants' conduct caused and will continue to cause confusion and mistake by leading the public to erroneously believe that Plaintiffs consented to the use of their likeness in the Fortnite game.

66. Plaintiffs are entitled to permanent injunctive relief

preventing Defendants, and its officers, agents, and employees, and all related persons from further using their likeness.

67. Plaintiffs are also entitled to recover damages, including any profits obtained by Defendant as a result of the infringements alleged above, in an amount according to proof to be determined at the time of trial.

COUNT FOUR

(Unfair Competition)

68. Plaintiffs hereby repeats and re-alleges the allegations set forth in paragraphs 1 through 67, above, as though fully set forth herein.

69. By exploiting and misappropriating Plaintiffs' copyright and likeness through the improper use of the Running Man dance, Defendant has engaged in business acts or practices that constitute unfair competition in violation of the Lanham Act, 15 U.S.C. Section 1051 *et. seq.*.

70. Defendants' willful and continued unauthorized use of the Running Man for commercial gain has caused and will continue to cause confusion and mistake by leading the public to erroneously associate the Running Man emote offered by Epic with the Running Man dance, as performed by Plaintiffs in their on-line video, in violation of The Lanham Act, 15 U.S.C §§1051 *et. seq.*

71. As a result of Defendant's violations, Defendant has unjustly enriched itself by 1) selling the infringing Running Man emote directly to players; 2) selling the Season 5 Battle Pass that contains the emote; 3) advertising the emote to attract additional players, including those persons familiar with the Running Man to play Fortnite and make in-game purchases; 4) staying relevant to its current players to incentivize those players to continue playing Fortnite; 5) impliedly representing that Plaintiffs consented to Epic's use of their likeness; 6) erroneously causing an association of its emote with Running Man; 7) creating the false impression that Plaintiffs endorsed Fortnite; and 8) inducing and/or contributing to Fortnite players' avatars performing the Running Man dance.

72. As a result of Defendant's conduct, Plaintiffs have been damaged by being precluded from receiving their rightful share of the profits from selling or licensing their exclusive copyright in the Running Man dance and/or their image.

73. Moreover, Plaintiffs were damaged by Defendant's conduct as they were prevented from realizing the profits of licensing their likeness to Defendant for commercial gain.

74. Plaintiffs are entitled to permanent injunctive relief preventing Defendant, and its officers, agents, and employees, and all related persons from further using their likeness.

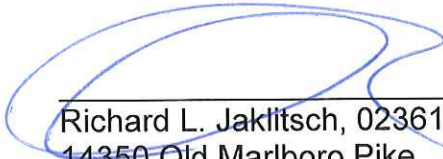
75. Plaintiffs are also entitled to recover damages, including any profits obtained by Defendant as a result of the infringements alleged above, in an amount according to proof to be determined at the time of trial.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request relief from this Court as follows:

1. An award of damages over and above \$5,000,000 for Defendant's violations of 15 U.S.C. S 1051 *et. seq.*;
2. An award of damages over and above \$5,000,000 for Defendant's violations of Plaintiffs' rights of publicity;
3. An award of exemplary damages over and above \$5,000,000 for Defendant's violations of Plaintiffs' rights of publicity;
4. An award of damages over and above \$5,000,000 for Defendants' infringement of Plaintiffs' copyright, and other damages;
5. An award for attorney's fees and costs of suit;
6. An Order enjoining and restraining Defendants from using, selling, or displaying Plaintiffs' copyright in its Fortnite game;
7. And for such other and further relief as this Court may deem just and proper.

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DEMAND FOR JURY TRIAL

Plaintiffs demand a trial by jury on all issues.



Richard L. Jaklitsch